



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

October 7, 2022

**BY ECF**

Hon. John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Maritime Legal Aid & Advocacy, Ltd. v. U.S. Maritime Administration.*, 22 Civ. 4308 (JGK)

Dear Judge Koeltl:

Pursuant to Section I.E of the Court's Individual Practices, I write respectfully on behalf of both parties to provide a status update pursuant to the Court's August 11, 2022 Order (ECF No. 20).

This case involves four Freedom of Information Act ("FOIA") requests to the United States Maritime Administration ("MARAD"), assigned control numbers 22-0040-FOIA, 22-0041-FOIA, 22-0088-FOIA, and 22-0089-FOIA.

22-0040-FOIA: MARAD has completed search, processing and production. MARAD produced a total of 531 pages, with 238 released in full and 293 partially redacted.

22-0041-FOIA: MARAD has made a partial response of 2,521 pages, with 2,311 pages released in full and 210 partially redacted. MARAD is consulting with other agencies and offices to ensure that its search is complete and expects to complete search, processing, and production by November 30, 2022.

22-0088-FOIA: MARAD has completed search, processing, and production. MARAD has made three responses, totaling 1,441 pages released in full.

22-0089-FOIA: This request involves packages of records totaling several thousand pages submitted by ship operators that work with MARAD. Pursuant to 49 C.F.R. part 7.29, the Department of Transportation must provide notice to the submitters and provide them a reasonable opportunity to respond and identify any records that should be withheld pursuant to FOIA Exemption 4 (or other exemptions). MARAD is in the process of sending submitter notices. Given the number of records and entities to be consulted, MARAD intends to make rolling partial responses and complete processing and production by December 31, 2022.

The parties have agreed that, in the interests of efficiency and judicial economy, Plaintiff will review the productions once they have been completed and the parties will inform the Court whether they intend to brief the adequacy of MARAD's search and the bases for any withholdings or redactions.

Accordingly, the parties respectfully propose to submit a status letter no later than December 12, 2022, informing the Court of the status of production.

I thank the Court for its consideration.

Respectfully,

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United States Attorney

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